

ROBERT GUILD  
*Attorney at Law*

256026  
256027

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419

**RECEIVED**

APR 02 2015

**PSC SC  
MAIL/DMS**

March 31, 2015

Ms. Jocelyn D. Boyd  
Chief Clerk  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, SC 29211

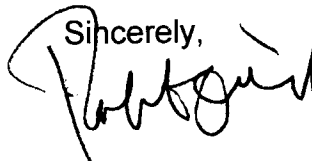
In Re: Application of Duke Energy Carolinas, LLC to Establish a Distributed Energy  
Resource Program  
Docket No. 2015-55-E  
and

Application of Duke Energy Progress, Inc. to Establish a Distributed Energy  
Resource Program  
Docket No. 2015-53-E

Dear Ms. Boyd:

Enclosed please find for filing and consideration Petitions to Intervene on behalf of the Sierra Club, together with Certificate of Service reflecting service upon all parties of record.

With kind regards I am

Sincerely,  
  
Robert Guild

Encl.s  
CC: All Parties

## STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Duke Energy Carolinas, LLC to  
Establish a Distributed Energy Resource ProgramBEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

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DOCKET

NUMBER: 2015 - 55 - E

(Please type or print)

Submitted by: Robert Guild  
Attorney at Law

SC Bar Number: 2358

Address: 314 Pall Mall  
Columbia, SC 29201

Telephone: 803 252 1419

Fax: 803 252 1419

Other:

Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition
 ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		

## STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Duke Energy Progress, Inc. to  
Establish a Distributed Energy Resource ProgramBEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

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DOCKET

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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2015-53-E

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In Re: Application of Duke Energy Progress, )  
Inc. to Establish a Distributed Energy )  
Resource Program )

**PETITION TO INTERVENE  
BY SIERRA CLUB**

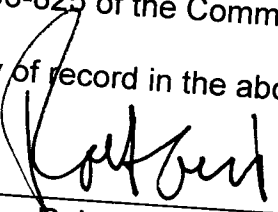
The Sierra Club, on behalf of its members who are customers of Duke Energy Progress, consumers of electrical energy and existing or potential users of distributed energy in South Carolina, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding. In support of this Petition, Sierra Club would respectfully show:

1. The Sierra Club is the oldest and largest non-profit grassroots environmental organization in the world with some 750,000 members, 65 Chapters and over 400 local groups. The South Carolina Chapter has eight local groups with more than 5,000 members across the state. The Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. The Club and its members actively promote safe energy solutions including energy efficiency and renewable energy resources to combat the climate

crisis and to protect human health and the natural environment. The organization has been actively involved in promoting the development of energy efficiency, solar and other distributed renewable energy production in South Carolina. The South Carolina Chapter of the Club has offices at 1314 Lincoln Street #211, Columbia, South Carolina 29301. Members of the Sierra Club are customers of Duke Energy Progress, consumers of electrical energy and existing or potential users of distributed energy in South Carolina, whose interests will be affected by the resolution of issues in this proceeding.

2. Members of the Sierra Club are interested in participating in this proceeding to urge the establishment of fair, just and reasonable terms of service and rates that will encourage the development of net metering, energy efficiency and distributed solar and other renewable energy resources for their future use and consumption in South Carolina.

WHEREFORE: For the foregoing reasons, Sierra Club, on behalf of its members who will be affected by the resolution of issues in this proceeding, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding.



---

Robert Guild  
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Columbia, South Carolina 29201  
SC Bar No. 2358  
Bguild@mindspring.com  
(803) 252 1419  
ATTORNEY FOR SIERRA CLUB

March 31, 2015

# CERTIFICATE OF SERVICE

I hereby certify that on this date I served the above PETITION TO INTERVENE by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

Charles A. Castle, Esquire  
Duke Energy Carolinas, LLC  
Associate General Counsel  
550 South Tryon Street/DEC 45 A  
Charlotte, NC 28202

Frank R. Ellerbe, III, Esquire  
Robinson, McFadden & Moore, P.C.  
Post Office Box 944  
Columbia, SC 29202-0944

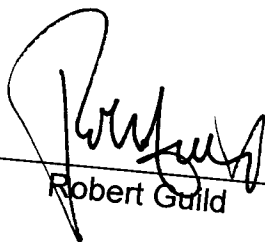
Andrew M. Bateman, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Scott Elliott, Counsel  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC, 29205

Stephanie U. Roberts, Esq.  
Spilman, Thomas & Battle, PLLC  
110 Oakwood Drive, suite 500  
Winston- Salem, NC 27103

Derrick Price Williamson, Esquire  
Spilman thomas & Battle, PLLC  
1100 Bnet Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050

March 31, 2015

  
Robert Guild

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2015-55-E

In Re: Application of Duke Energy Carolinas,	)	<b>PETITION TO INTERVENE</b>
LLC to Establish a Distributed Energy	)	<b>BY SIERRA CLUB</b>
Resource Program	)	

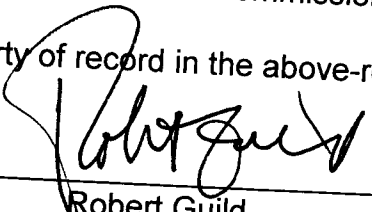
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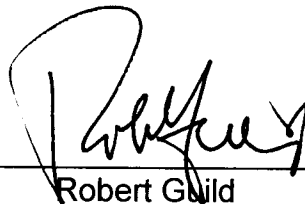
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